UNITED STATES DISTRICT COURT SOUTHERN DISTRICT OF INDIANA (Indianapolis Division)

RED BARN MOTORS, INC.,

PLATINUM MOTORS, INC.,

MATTINGLY AUTO SALES, INC.,

YOUNG EXECUTIVE MANAGEMENT *

& CONSULTING SERVICES, INC.,

Individually, and on behalf of other

members of the general public

similarly situated

*

DOCKET NO. 1:14-cv-01589-TWP-DKL

CLASS ACTION Jury Trial Demanded

COX ENTERPRISES, INC.,
COX AUTOMOTIVE, INC.,
NEXTGEAR CAPITAL, INC.,
F/K/A DEALER SERVICES
CORPORATION, successor by merger
with Manheim Automotive Financial
Services, Inc., and JOHN WICK

v.

DECLARATION OF CASSIE ERIN FELDER IN SUPPORT OF PLAINTIFFS' MOTION FOR APPOINTMENT OF CLASS COUNSEL

- I, Cassie Erin Felder, being first duly sworn upon my oath and under penalties of perjury, do hereby make the following statements based upon my own personal knowledge:
 - 1. My name is Cassie Erin Felder, and I am the above-named individual.
 - 2. I am a shareholder with Lugenbuhl, Wheaton, Peck, Rankin & Hubbard in Baton Rouge, Louisiana, and am one of the counsel of record for the named plaintiffs in the above-referenced matter. I have been counsel of record in the above-referenced matter since it was first filed in the United States District Court for the Middle District of Louisiana in 2013 and have worked closely with Red Barn Motors, Inc., the original plaintiff in this action since 2013.

- 3. This declaration is submitted in support of Plaintiffs' Motion for Class Certification and Appointment of Class Counsel.
- 4. I am an adult of sound mind, and all of the statements in this Declaration are of my own personal knowledge.
- I currently reside in Baton Rouge, Louisiana. I have lived in Louisiana for most of my life, and most recently since 2008.
- I am in the private practice of law, having graduated from Tulane University School of Law – New Orleans, LA in 2000 and Master of Laws (LL.M) in Taxation – Boston University, Boston, MA in 2001.
- 7. I was admitted to the Louisiana Bar in 2002. I am also admitted to practice before all Louisiana state courts, the United States District Courts for the Eastern, Middle, and Western Districts of Louisiana, and the United States Fifth Circuit Court of Appeals.
- 8. I was also admitted to the Colorado Bar in 2005, for which I maintain an inactive license, and admitted to the Texas Bar in 2016.
- 9. After law school, I was an associate attorney with the law firm of Schaneville & Baringer in Baton Rouge, LA; McCloskey & Langenstein in New Orleans, LA; Chopin, Wagar, Richard & Kutcher in New Orleans, LA; Orrill, Cordell & Beary in New Orleans, LA; and Baker Botts in Austin, TX. I practiced business law, tax law, and litigation handling a variety of complex matters.
- 10. In the courtroom, my experience includes jury trials, bench trials, and appellate arguments.
- 11. In 2009 through 2016, I began my own litigation practice in Baton Rouge, Louisiana.
 Cassie Felder & Associates, L.L.C. provided services to a variety of clients in many

types of litigation, including, but not limited to, commercial litigation, construction, and tax litigation.

12. In March, 2016, I joined Lugenbuhl, Wheaton, Peck, Rankin & Hubbard in Baton Rouge, Louisiana, as a shareholder, where I continue to represent a variety of clients in a variety of litigation matters.

I AFFIRM UNDER THE PENALTIES OF PERJURY THAT THE FOREGOING FACTS AND REPRESENATIONS ARE TRUE AND CORRECT.

Dated: 9/38/16

By:

CASSIE E. FELDER